1 2 Kurt M. Rylander, OSB No. 94427 3 rylander@rylanderlaw.com RYLANDER & ASSOCIATES PC 4 PO Box 250 5 Vancouver, WA 98666 Tel: 360.750.9931 Fax: 360.397.0473 Attorneys for Defendants 7 Trailer City, Inc. and Don E. Walker 8 9 10 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON 11 12 VINCENT L. WEBB, a resident of 13 the State of Nevada 14 Plaintiff(s), No. 3:11-cv-00747-BR  $\mathbf{v}$ . 15 TRAILER CITY, INC., and Oregon SECOND STIPULATION FOR 16 corporation, DON E. WALKER, a EXTENSION OF TIME TO 17 person, and CHANGZHOU ANSWER OR OTHERWISE NANXIASHU TOOL CO., LTD., a RESPOND TO THE COMPLAINT 18 foreign corporation Defendant(s), 19 20 COMES NOW Defendants TRAILER CITY, INC., and DON E. 21 WALKER, by and through their attorney of record, KURT M. RYLANDER, and 22 the Plaintiff, VINCENT L. WEBB, by and through its attorney of record, 23 KERRY J. SHEPHERD, pursuant to Fed. R. Civ. P. 6(b), and stipulate to an 24 25 extension of time until August 31, 2011, for Defendants TRAILER CITY, INC., 26 and DON E. WALKER to file an answer or otherwise respond to the Complaint 27

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in the above-entitled matter.

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the grounds that the parties to the stipulation are in settlement discussions and believe they have the framework for a settlement. The principals of the parties are both currently out of country and are not available to meet and finalize the framework. The parties to the stipulation have agreed that the additional time to respond will promote early settlement negotiations and potentially avoid further litigation efforts as to the instant defendants.

This is the second stipulation in this case. This stipulation is made upon

Counsel for Plaintiff has been contacted and has approved this stipulated motion and has authorized the use of his electronic signature below.

DATED This July 29, 2011 /s/ Kurt M. Rylander KURT M. RYLANDER, OSB 94427 RYLANDER & ASSOCIATES PC E-mail: rylander@rylanderlaw.com

Of Attorneys for Defendants, Trailer City, Inc. & Don E. Walker

DATED This July 29, 2011 /s/ Kerry J. Shepherd

KERRY J. SHEPHERD, OSB 944343 MARKOWITZ HERBOLD GLADE & HELHAF PC

E-mail: kerryshepherd@mhgm.com Of Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the date signed below I electronically filed the document to which this certificate is attached with the clerk of the court using the CM/ECF system, which will send email notification of such filing to Attorneys for Plaintiff: Kerry J. Shepherd, kerryshepherd@mhgm.com

DATED This July 29, 2011 /s/ Kurt M. Rylander

Kurt M. Rylander

Of Attorneys for Defendants,

Trailer City, Inc. & Don E. Walker